

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA**

HUNTER CREGER, individually and on
behalf of all others similarly situated, *et al.*

Plaintiffs,

v.

UNITED LAUNCH ALLIANCE, LLC;

Defendant.

Civil Action No.:

AFFIDAVIT OF CHRISTOPHER HUNTER CREGER

I, Christopher Hunter Creger, declare as follows:

1. I am 23 years of age and I am a resident of Harvest, Alabama.
2. I am a laser weld technician at United Launch Alliance, and have been in that position since April 6, 2020. I have regularly received strong performance reviews. My current salary is \$26.90/Hr.
3. As a laser weld technician, my principal work consists of welding aerospace components for the Centaur V line. I work in a 3-person work cell. My desk is located 6ft away from the desks of my co-workers. Since the beginning of the pandemic we have set up hand washing stations and maintained social distance while working
4. In the Two years I have worked at United Launch Alliance, I have never been required to travel. Laser Weld Technicians have no need to access federal facilities.
5. For the past year and a half since the COVID pandemic began, I have done my work as a laser weld technician at ULA while mostly working with mask and social distance restrictions and submitting to temperature checks. Since the pandemic began, rarely have I come in contact with infected individuals, and each time I was, I went under quarantine for the required amount of time. I could undertake regular COVID testing if necessary.
6. On August 25, 2021, ULA's President and CEO, Tony Bruno, announced in an email to "All ULA Teammates" that "ULA will require the COVID vaccination as a condition of employment beginning Sept. 1, 2021."
7. On September 1, 2021, ULA announced new policy CPS-086, which "requires all employees and contractors with badged, unescorted access to ULA facilities to be vaccinated against COVID-19 as part of its continued efforts to maintain a safe workplace."

8. In its HR-527, ULA COVID Vaccination Process Instruction issued that same day, ULA announced that “Effective October 1, 2021, ULA will begin requiring all employees to be vaccinated against COVID-19 as a condition of employment.”

9. The Instructions further provided that “Those employees or On-Site Contractors who are not already fully vaccinated will need to receive the first dose of the Pfizer or Moderna vaccine, or the single dose of the Johnson & Johnson vaccine, by October 29, 2021. They will need to receive the second dose of the Pfizer or Moderna vaccine by November 30, 2021.”

10. On September 7, 2021, ULA’s President and CEO, Tony Bruno, gave a video presentation in which he announced that ULA would be implementing a vaccine mandate but specifically informed ULA employees that they would be eligible for exemption based on sincerely-held religious beliefs. I received a link to that video presentation on September 22, 2021, by email.

11. On September 24, 2021, I submitted a request for a religious accommodation from ULA’s vaccine mandate. A true and correct copy of that religious accommodation request is attached hereto as Exhibit A.

12. On October 7, 2021, I met with Noella Guitierrez, my HR contact, to discuss my request for religious exemption from the vaccine mandate. She grilled me about my religious faith to determine whether my religious objection was sincerely held, but at no point did she discuss possible accommodations or engage in any interactive process or dialogue about possible accommodations.

13. ULA denied my request for religious accommodation on October 22, 2021, contending, among other things, that it had received too many religious accommodation requests to be able to accommodate. ULA advised me that it would deem me to have “voluntarily resigned” if I did not receive the first dose (or, in the case of a single-dose vaccine, the only dose) of an approved Covid-19 vaccine by Friday, October 29, 2021. A true and correct copy of ULA’s denial of my religious accommodation request is attached hereto as Exhibit B.

14. On October 22, 2021, I requested an appeal of the denial of my religious accommodation request.

15. I was suspended by ULA pending investigation on Wednesday, October 27th. I believe this suspension was due to my involvement in a legal protest of the vaccine mandate.

16. I am a Roman Catholic, and my sincerely-held religious beliefs bar me from taking a vaccine that was manufactured and/or tested on cell lines derived from stem cells of aborted fetuses, as all of the currently available Covid-19 vaccines are. Accordingly, and as I advised ULA, I cannot in good conscience comply with the vaccine mandate that has unilaterally been imposed by ULA as a condition on my employment.

17. On October 23, 2021, I filed with the Equal Employment Opportunity Commission a charge against ULA for religious discrimination on the basis of ULA’s denial of my request for religious accommodation. A true and correct copy of that EEOC charge is attached hereto as Exhibit C.

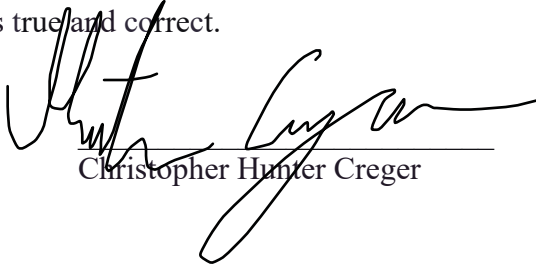
18. EEOC notified me that my initial interview would be held on February 7, 2022. A true and correct copy of that notification is attached hereto as Exhibit D.

19. Since ULA's mandatory vaccine policy was first announced in August, 2021, I have been trying to find other employment in my field, but have thus far been unsuccessful.

I declare under penalty of perjury that the foregoing is true and correct.

11/9/2021

Date



Christopher Hunter Creger

EXHIBIT A

COVID-19 RELIGIOUS ACCOMMODATION REQUEST FORM

Policy Statement & Instructions:

Consistent with federal, state and local law, United Launch Alliance (“ULA”) provides reasonable accommodation for employees’ sincerely held religious beliefs, practices, and observances unless providing a reasonable accommodation would result in undue hardship to ULA. If you are seeking an accommodation from the ULA’s COVID-19 Vaccination Policy (the “Policy”) due to religious reasons, please complete this form and return it to your Human Resources Business Partner.

We request that you complete this form because, in some cases, a person’s religious beliefs may be more subjective than objective. If your religious accommodation is not required by the tenets of a specific religion, ULA will need to understand the basis and source of your religious beliefs to reasonably assess whether your request qualifies for a religious accommodation. This is the reason for many of the questions below. The information you provide will allow us to evaluate your request and decide whether we can grant an accommodation in this instance. It is possible that more information will be necessary to evaluate your request, and if so, we will follow up with you for more information. Requests will be processed pursuant to ULA’s Reasonable Accommodation Policy, HR-126, and we will inform you once a decision is made on your request.

Company Expectations for Cooperation and Honesty:

As COVID-19 continues to significantly challenge our employees, customers and business, it is more important than ever to work cooperatively with one another. ULA respects employee religious and personal beliefs but also expects employees to cooperate as ULA evaluates accommodation requests, including but not limited to providing true and accurate information in furtherance of accommodation requests. ULA also expects compliance with the United Launch Alliance Code of Conduct. If ULA determines employees have failed to cooperate with its reasonable information requests or employees have acted dishonestly in advancing such requests, it may deny the accommodation request and, if appropriate, take disciplinary action including potentially terminating an employee’s employment.

Employee Name: Hunter Creger

Position: Weld Technician Centaur V Gore Welder

Supervisor: Tim Swart

1. Please describe in detail the provision(s) of ULA’s COVID-19 Vaccination Policy from which you are seeking accommodation and the accommodation you are requesting.

I am invoking my right to religious exemption protected by U.S. civil liberty laws from the mandatory vaccine requirement. I am requesting accommodation due to my Catholic religious beliefs.

2. Please identify the religious belief, practice, or observance that is causing you to seek the accommodation identified in response to Question No. 1.

I am a practicing Traditional Roman Catholic. Keeping within tradition of the church, I believe that life begins at conception. As a Catholic, I cannot in good faith participate in any practice that involves the use of murdered or trafficked children in any stage of development. I do not believe that the

relationship that science has with abortion is ethical or moral and I have elected to not participate in its application in medicine, or any other commercial pursuit.

3. Please describe the conflict between such religious belief, practice, or observance and the provision(s) of the COVID-19 Vaccination Policy identified in response to Question No. 1.

The Johnson & Johnson vaccine uses retinal cells from a fetus that was aborted in 1985 (PER.C6) and treated in a lab since. The Pfizer and Moderna vaccines test the mRNAs on an aborted fetus from 1973 (HEK-293). Therefore as a faithful Catholic, I cannot according to the Church tenets on conscience which are in the Vatican document outlined below, use any product that takes its origin in abortion.

"As regards the diseases against which there are no alternative vaccines which are available and ethically acceptable, it is right to abstain from using these vaccines if it can be done without causing children, and indirectly the population as a whole, to undergo significant risks to their health." (Moral Reflections on Vaccines Prepared From Cells Derived From Aborted Human Fetuses, Pontifical Academy for Life, June 2005).

In regard to causing "significant risk" to the population as whole, I am inclined to remind the reader that current CDC statistics state that 98.2% of Covid-19 patients in the US survive their illness. This number is inflated to begin with, because it does not include underlying health conditions that may have affected the severity of the virus. I do not believe that by not taking the vaccine I am putting anyone at risk, especially since there is no guarantee that getting vaccinated will prevent me from getting and spreading the virus.

Secondly, the state or any corporation does not have the authority to force any medical procedures under the threat of the termination and potential poverty. Romans 13:1 States *"Let every soul be subject to higher powers: for there is no power but from God: and those that are, are ordained of God."* Therefore I have the right to hold complete domain over my own medical decisions and procedures. I also have the right to uphold my own moral conscious in believing that all humans from the moment of conception have the right to not be murdered, trafficked, and or experimented on. Any infringement or threats received due to this belief is a violation of my freedom to practice religion and is protected by US religious liberty laws and the first amendment.

4. Is the religious belief, practice, or observance you identified in response to Question No. 2 based on an organized religious faith to which you belong, and if so, please describe?

Yes, my faith is based on the teachings of the Roman Catholic Church and the teachings from its founder, Jesus Christ where he himself condemned murder.

"You have heard that it was said to them of old: Thou shalt not kill. And whosoever shall kill shall be in danger of the judgment. But I say to you, that whosoever is angry with his brother, shall be in danger of the judgment. And whosoever shall say to his brother, Raca, shall be in danger of the council. And whosoever shall say, Thou Fool, shall be in danger of hell fire." (Mathew: 21-22)

Therefore as a Catholic, I am morally opposed to receiving any vaccine that was produced using the remains of murdered children, for if I do I'll be participating in that murder. Any opinions held by church leadership that conflict in this matter are considered null and void due to the fact that they are in direct contradiction of church teaching. Furthermore any beliefs I hold in good faith that are not shared with

church leadership are protected under Thomas v. Review Board of the Indiana Security Division, 450 U.S. 707 which guarantees free exercise of my religious beliefs which are not shared with all members of a religious sect.

5. If your request for accommodation is not based on an organized religious faith to which you belong, please describe the basis for the religious belief, practice, or observance you have identified in response to Question No. 2.

6. Have you received other vaccinations previously? If so, please describe why the religious belief, practice, or observance you have identified did not prevent you from getting that vaccination(s).

Any vaccinations I have received in the past were either when I was a child and not in control of my medical decisions or did not contain/use aborted fetal cells

7. Would receiving a COVID-19 vaccine interfere with your ability to practice your religion? If so, please explain.

Yes. The Fourth Lateran Council states,

"The Divine Law," says Cardinal Gousset, "is the supreme rule of actions; our thoughts, desires, words, acts, all that man is, is subject to the domain of the law of God; and this law is the rule of our conduct by means of our conscience. Hence it is never lawful to go against our conscience; as the Fourth Lateran council says, 'Quidquid fit contra conscientiam, aedificat ad gehennam.'" ["Whatever is done in opposition to conscience is conducive to damnation."]

8. Please describe how the religious belief, practice, or observance you have identified in response to Question No. 2 effects other aspects of your life, such as if it prevents you from receiving certain medical care. (Please do not share any medical information, including without limitation any diagnosis or treatment information.)

The Catholic Church requires that I, the faithful abstain from any medical treatment that causes the harm or death of another individual or myself. An example of these things would be; participation in or encouragement of an Abortion, Euthanasia, and vaccinations or any kind of medication that use aborted fetal cells. The Catholic Church also does not allow the use of contraceptives or birth control.

9. Is there anything else you would like the company to know about your request for accommodation? If so, please provide that information here or attach any documents you wish to provide.

Taking this Vaccine would be considered a mortal sin in the Catholic Church. I do not wish to put my soul at risk of eternal damnation in order to receive this vaccine. I am also saddened to be put in a situation where I have to choose between violating my own moral beliefs, putting my relationship with God in jeopardy, and risking my own personal health in order to keep my job. It's a tragedy that I may lose my job because of something that has nothing to do with my merit or job performance. I pray the ULA retracts this tyrannical decision before we begin to lose any more talent and morale.

Employee Acknowledgment: I acknowledge that I have read and understand this request form and that all statements made above are complete and accurate to the best of my knowledge. I understand that any intentional misrepresentation contained in this request may result in disciplinary action. I

understand that the accommodation requested above may not be granted if I have not identified a religious belief, practice, or observance that conflicts with the COVID-19 Vaccination Policy or if the accommodation is not reasonable or imposes an undue hardship.

Date: 9-17-21 Signature: _____ Name: Hunter Creger

In regard to using such vaccines, the Vatican has instructed the faithful that:

“As regards the diseases against which there are no alternative vaccines which are available and ethically acceptable, it is right to abstain from using these vaccines if it can be done without causing children, and indirectly the population as a whole, to undergo significant risks to their health.” (Moral Reflections on Vaccines Prepared From Cells Derived From Aborted Human Fetuses, Pontifical Academy for Life, June 2005).

“They should take recourse, if necessary, to the use of conscientious objection with regard to the use of vaccines produced by means of cell lines of aborted human fetal origin.” “Such a duty may lead, as a consequence, to taking recourse to “objection of conscience” when the action recognized as illicit is an act permitted or even encouraged by the laws of the country and poses a threat to human life. The Encyclical Letter Evangelium Vitae underlined this “obligation to oppose” the laws which permit abortion or euthanasia ‘by conscientious objection.’

*“It is up to the faithful and citizens of upright conscience (fathers of families, doctors, etc.) to oppose, even by making an objection of conscience, the ever more widespread attacks against life and the “culture of death” which underlies them.” “[T]here is a grave responsibility to use alternative vaccines and to make a conscientious objection with regard to those which have moral problems.” “As regards those who need to use such vaccines **for reasons of health**, it must be emphasized that, apart from every form of formal cooperation, in general, doctors or parents who resort to the use of these vaccines for their children, in spite of knowing their origin (voluntary abortion), carry out a form of **very remote mediate material cooperation**, and thus very mild, in the performance of the original act of abortion, and a **mediate material cooperation**, with regard to the marketing of cells coming from abortions, and **immediate**, with regard to the marketing of vaccines produced with such cells. However, in this situation, the aspect of passive cooperation is that which stands out most. It is up to the faithful and citizens of upright conscience (fathers of families, doctors, etc.) to oppose, even by making an objection of conscience, the ever more widespread attacks against life and the “culture of death” which underlies them. From this point of view, the use of vaccines whose production is connected with procured abortion constitutes at least a **mediate remote passive material cooperation** to the abortion, and an **immediate passive material cooperation** with regard to their marketing.”*

The Catechism of the Catholic Church which Pope John Paul II declared to be the “sure teaching norm of the Catholic Church”

1776 *Deep within his conscience man discovers a law which he has not laid upon himself but which he must obey. Its voice, ever calling him to love and to do what is good and to avoid evil, sounds in his heart at the right moment.... For man has in his heart a law inscribed by God.... His conscience is man’s most secret core and his sanctuary. There he is alone with God whose voice echoes in his depths.*

1777 *Moral conscience, present at the heart of the person, enjoins him at the appropriate moment to do good and to avoid evil. It also judges particular choices, approving those that are good and denouncing those that are evil. It bears witness to the authority of truth in reference to the supreme Good to which the human person is drawn, and it welcomes the commandments. When he listens to his conscience, the prudent man can hear God speaking.*

1778 *Conscience is a judgment of reason whereby the human person recognizes the moral quality of a concrete act that he is going to perform, is in the process of performing, or has already completed. In all he says and does, man is obliged to follow faithfully what he knows to be just and right. It is by the judgment of his conscience that man perceives and recognizes the prescriptions of the divine law:*

Conscience is a law of the mind; yet [Christians] would not grant that it is nothing more; I mean that it was not a dictate, nor conveyed the notion of responsibility, of duty, of a threat and a promise.... [Conscience] is a messenger of him, who, both in nature and in grace, speaks to us behind a veil, and teaches and rules us by his representatives. Conscience is the aboriginal Vicar of Christ.

1779 *It is important for every person to be sufficiently present to himself in order to hear and follow the voice of his conscience. This requirement of interiority is all the more necessary as life often distracts us from any reflection, self-examination or introspection.*

Return to your conscience, question it.... Turn inward, brethren, and in everything you do, see God as your witness.

1806 *Prudence is the virtue that disposes practical reason to discern our true good in every circumstance and to choose the right means of achieving it. Prudence is ‘right reason in action,’ writes St. Thomas Aquinas. It is called auriga virtutum (the charioteer of the virtues); it guides the other virtues by setting rule and measure. It is prudence that immediately guides the judgment of conscience. The prudent man determines and directs his conduct in accordance with this judgment.*

We are also taught through the teachings of Papal Encyclicals that conscience is the Divine Law which is inscribed into the heart and soul of man by God. For example: “The natural law is written and engraved in the soul of each and every man, because it is human reason, ordaining him to do good and forbidding him to sin...But this command of human reason

would not have the force of law if it were not the voice and interpreter of a higher reason to which our spirit and freedom must be submitted.” (Leo XIII *Libertas Praestantissimum*, 597)

“On his part, man perceives and acknowledges the imperatives of the divine law through the mediation of conscience. It is through his conscience that man sees and recognizes the demands of divine law. He is bound to follow this conscience faithfully in all his activity so that he may come to God, who is his last end. Therefore he must not be forced to act contrary to his conscience. Nor must he be prevented from acting according to his conscience, especially in religious matters. The reason is that the exercise of religion, of its very nature, consists before all else in those internal, voluntary and free acts whereby man sets the course of his life directly toward God. Acts of this kind cannot be commanded or forbidden by any merely human authority.” (*Dignitatis Humanae*, Pope Paul VI, 1965).

Synod of Bishops’ address to the United Nations October 2, 1979:

“In accordance with their dignity, all human beings, because they are persons, that is, beings endowed with reason and free will and, therefore, bearing a personal responsibility, are both impelled by their nature and bound by a moral obligation to seek the truth, especially religious truth. They are also bound to adhere to the truth once they come to know it and to direct their whole lives in accordance with its demands” (*Dignitatis humanae*, 2). “The practice of religion by its very nature consists primarily of those voluntary and free internal acts of conscience by which a human being directly sets his course towards God. No merely human power can either command or prohibit acts of this kind”

Pope Paul VI, 1965 *Gaudium et Spes*: “For its part, authentic freedom is an exceptional sign of the Divine image within man. For God has willed that man remain “under the control of his own decisions, so that he can seek his Creator spontaneously, and come freely to utter and blissful perfection through loyalty to Him. Hence man’s dignity demands that he act according to a knowing and free choice that is personally motivated and prompted from within, not under blind internal impulse nor by mere external pressure.” **Fourth Lateran Council:**

“The Divine Law,” says Cardinal Gousset, “is the supreme rule of actions; our thoughts, desires, words, acts, all that man is, is subject to the domain of the law of God; and this law is the rule of our conduct by means of our conscience. Hence it is never lawful to go against our conscience; as the Fourth Lateran council says, ‘Quidquid fit contra conscientiam, aedificat ad gehennam.’” [“Whatever is done in opposition to conscience is conducive to damnation.”]

EXHIBIT B

REASONABLE ACCOMMODATION DECISION FORM

COVID-19 Vaccine Policy

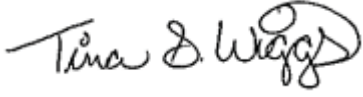


Reasonable Accommodation Decision Form				
The chair of the Accommodation Committee must complete this form and submit copies of all information reviewed, considered and / or gathered in making a decision to the Talent Management Department within five days of completion.				
Chair Person's Name: Tina Wiggs			Phone Number: 256-432-1109	
Position Title: HRBP			E-mail: constantina.s.wiggs@ulalaunch.com	
Site: Decatur				
List the names of the Accommodation Committee members consulted in this case, including the employee:				
Name	Site	Function	Phone Number	E-mail
Gillian Dale	Denver	Legal	303-269-5876	gillian.dale@ulalaunch.com
Amy Logsdon	CCSFS	HR	321-730-5632	amy.logsdon@ulalaunch.com
Lourie Bradley	Decatur	HR	256-432-1956	lourie.a.bradley@ulalaunch.com
Jennifer Morgan	Decatur	HR	256-432-1955	jennifer.l.morgan@ulalaunch.com
Janet Williams	Denver	HR	303-269-5961	janet.m.williams@ulalaunch.com
Noelia Gutierrez	Harlingen	HR	956-430-7835	noelia.gutierrez@ulalaunch.com
Mary Ann Milton	Denver	HR	303-269-5548	maryann.milton@ulalaunch.com
Jose Duenas	VSFB	HR	805-606-3585	jose.g.duenas@ulalaunch.com
Kia Silverman	Denver	HR	303-269-6456	kia.silverman@ulalaunch.com
Linda Wyman	CCSFS	HR	321-730-0495	linda.m.wyman@ulalaunch.com
Answer the following questions:				
Name of the person requesting the reasonable accommodation: Christopher Hunter Creger				
Site and name of business group of requestor: ULA Decatur Production Facility				
Job title of the requestor: Aerospace Production Tech				
Name of leader of requestor: Timothy Swart				
Describe the accommodation requested and the reason for the request: Exemption from the COVID-19 vaccination mandate for religious reasons				
If accommodation is approved, describe the accommodation granted and the reason for approval:				
If accommodation is granted, describe any conditions on approval:				
If accommodation is denied, provide the reason for denial: This request is being denied because the accommodation would result in an undue hardship to ULA. Factors that contribute to the undue hardship include, but are not limited to: the high volume of requests to accommodate that qualified under the sincerely held belief prong of the analysis; the need to ensure a healthy and safe workplace; the time, cost, and administration burden associated with weekly testing; potential issues with the availability of testing; ULA's requirements as a federal government contractor, including NRO requirements to staff contracts with vaccinated workers; the need to comply with strict contract requirements, including launch schedules, and the potential financial risks of failure to satisfy such requirements; the nature of our workplace and business, including the need for on-site work; the need for employees to interact with others, travel, and access customer facilities, including federal facilities with strict access requirements; the number of prior COVID cases and quarantines at ULA, including multiple				

REASONABLE ACCOMMODATION DECISION FORM

hospitalizations and deaths; and the presence of continued active COVID-19 cases and quarantines at ULA despite prior safety measures.

Date requestor was notified of decision: 10/22/2021

	HRBP	10/22/2021
Signature	Title	Date

Reasonable accommodation approvals to the COVID-19 vaccine policy are **provisional** and not considered permanent. Employees with an approved accommodation will be required to complete regular COVID-19 testing, in lieu of receiving the vaccine. Testing will be done weekly, at minimum, and customer requirements may require more frequent testing in some situations, which may apply to the employee. Failure to comply with the testing requirements will result in revocation of the accommodation.

Approvals may be reassessed and/or revoked by ULA at any time. Reasons that may result in discontinuing the accommodation include, but are not limited to: ULA determines it is an undue hardship to continue the accommodation, customer requirements change, there is a change in the employee's job, a new vaccine is developed that does not conflict with the employee's sincerely held religious beliefs, or the approval was based on untruthful or inaccurate information provided by the employee. ULA will re-engage the employee in the interactive process prior to reassessing or revoking the approved accommodation.

EXHIBIT C

EEOC (INQUIRY) NUMBER: 420-2022-00197

Inquiry Information

REASON(S) FOR CLAIM

Date of Incident (Approximate): 10/22/2021

Reason for Complaint: Religion

Pay Disparity:

Location of Incident: Alabama

Submission (initial inquiry) Date: 10/23/2021

Claim previously filed as charge with EEOC? No

Approximate Date of Filing: N/A

Charge Number: N/A

Claim previously filed as complaint with another Agency? No

Agency Name: N/A

Approximate Date of Filing: N/A

Nature of Complaint: N/A

INQUIRY OFFICE

Receiving: Birmingham District Office

Accountable: Birmingham District Office

APPOINTMENT

Appointment Date and time:

Interview Type:

APPROXIMATE DEADLINE FOR FILING A CHARGE: 04/21/2022

POTENTIAL CHARGING PARTY

First Name, Middle Initial: Christopher, H

Last Name: Creger

Street or Mailing Address: 230 Blackwater dr

Address Line 2:

City, State, Zip: HARVEST, AL, 35749

Country: UNITED STATES OF AMERICA

Year of Birth:

Email Address: hunter.creger@gmail.com

Home Phone Number: (720) 466-0774

Cell Phone Number:

RESPONDENT/Employer

Organization Name: UNITED LAUNCH ALLIANCE

Type of Employer: Business or non-profit organization that I applied to, work for, or worked for

Number of Employees: 20 or more employees

Street or Mailing Address: 1001 red hat road

Address Line 2:

City, State, Zip Code: DECATUR,AL, 35601

County: Morgan

Phone Number: (256) 432-1000

RESPONDENT CONTACT

First and Last Name: Laurie Bradley

Email Address:

Phone Number:

Title: Human Resources Director or Owner

LOCATION OF POTENTIAL CHARGING PARTY'S EMPLOYMENT

Street or Mailing Address:

Address Line 2:

City, State, Zip Code:

County:

POTENTIAL CHARGING PARTY'S DEMOGRAPHICS

Gender: M

Disabled: I do not have a disability

Are you Hispanic or Latino? not hispanic or latino

Ethnicity: White,

National Origin: Other

Adverse Action(s)

I was denied my religious accommodation request on the basis that I'm a practicing traditional Roman Catholic

Supplemental Information

What Reason(s) were you given for the action taken against you?

The company claimed "undo-hardship" for my religious accommodation

Was anyone in a similar situation treated the same, better, or worse than you?

Yes there were several people who were also denied their religious exemption from taking the vaccine. Anyone who wasn't religious or had the vaccine already gets to keep their job

Please provide name(s) and email and/or phone number of anyone who will support your claim, and briefly describe the information this person will provide.

Johnny Dingler 256-636-0297

Arthur Brienlinger 321-474-6064

Tim McCormick 256-303-4789

Zac Breland 256-958-1815

Aaron Edwards 256-318-5860

Additional contacts can be provided upon request

Please tell us any other information about your experience?

All religious exemptions were denied across the board. I have until Friday the 29th to violate my personal religious beliefs and get vaccinated or I'm fired

EXHIBIT D

phone with the Equal Employment Opportunity Commission (EEOC) regarding your inquiry **420-2022-00197**. This email is for **02/07/2022 at 08:30 AM CST**.

Use the password for your EEOC Public Portal user account with you

[EEOC Public Portal](#) as soon as possible to provide additional information about your inquiry. Providing additional information will add or edit the additional information up until you have your interview with EEOC. The information you provide is confidential.

NOT THE SAME AS FILING A CHARGE OF DISCRIMINATION.

This is a statement asserting that an organization engaged in employment discrimination. It requests EEOC to take remedial action before you can file a lawsuit for unlawful discrimination. There are strict [time limits](#) for filing a charge.

Please log into the [EEOC Public Portal](#) and select the Schedule an Interview option for your inquiry.

All information contained in this transmission may contain privileged and confidential information, including information protected by the attorney-client privilege. If you are not the intended recipient, you are hereby notified that any review, dissemination, distribution, or use of this information is strictly prohibited. If you are not the intended recipient, please contact us at digitalsupport@eeoc.gov and destroy all copies of the original transmission.